

# Modern Slavery Statement

For Year Ending 31 December 2023



**OCTEC** LIMITED



OCTEC Limited  
Main Administration  
Old Town Hall Building  
PO Box 1566  
Orange NSW 2800  
Ph: (02) 6362 7973  
Fax: (02) 6361 7217  
Email: [mail@octec.org.au](mailto:mail@octec.org.au)  
Website: [www.octec.org.au](http://www.octec.org.au)

## Introduction

OCTEC Limited is a community business providing employment, education, training and advocacy services in NSW, ACT, Victoria and Queensland.

OCTEC is committed to upholding human rights and acting with integrity for our people and the wider community. This includes our commitment to address the risks of modern slavery within our operations wherever possible, and to partner with suppliers who share our values.

OCTEC's Modern Slavery Statement addresses the seven mandatory criteria required under the Modern Slavery Act 2018:

1. identify the reporting entity
2. describe the reporting entity's structure, operations and supply chains
3. describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls
4. describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes
5. describe how the reporting entity assesses the effectiveness of these actions
6. describe the process of consultation with any entities the reporting entity owns or controls, and
7. provide any other relevant information.

## Reporting Entity (Criterion 1)

OCTEC Limited, ACN 147 511 215 and ABN 91336868595, is the reporting entity covered by this Modern Slavery Statement.

## Structure, Operations and Supply Chains (Criterion 2)

### Structure

OCTEC Limited is an Australian Public Company trading as OCTEC Limited, with a head office at 247 Anson Street Orange NSW 2800.

OCTEC is governed by a Board of Directors as a company limited by guarantee under the Corporations Act 2001 and Australian Charities and Not-for-profits Commission Act 2012.

OCTEC's CEO reports to the Board and leads a Senior Management Team responsible for the delivery of all OCTEC programs and services. At the end of the reporting period, OCTEC had a workforce of approximately 530 employees.



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OCTEC is not part of a larger corporate group of entities and does not control or own other entities. Huntley Berry Farm is an OCTEC-registered Business Name that we use for branding of our Australian Disability Enterprise.

## Operations

OCTEC Limited commenced operations in 1976 and now has 275 service locations across the Eastern States and the Australian Capital Territory.

OCTEC's Mission is: Providing individuals with training and employment opportunities, assisting industry to recruit and develop skilled workforces, and contributing to communities becoming more sustainable.

OCTEC delivers a wide range of programs and services:

**Employment Services** – Disability Employment Services, Transition to Work youth employment services, Savvy Parents pre-employment services, Jobs Victoria employment mentoring services, Mental Health Employment Strategy.

**Training Services** – Business and Service Industries, Community Services and Health including Aged Care, Disability Services and Home and Community Care, Retail, Supply Chain and Training for Regional Councils.

**Community Development** – Huntley Berry Farm (an Australian Disability Enterprise), OCTEC NDIS services, National Panel of Assessors services, Technology Services and Goldie College support services.

Our services are made available to all clients (and potential clients) regardless of race, gender, age, marital status, physical or intellectual impairment, or sexual orientation. OCTEC fully supports relevant anti-discrimination legislation and treats every client fairly and without discrimination. OCTEC staff are made aware of their access and equity responsibilities and of the importance of flexibility in delivery to cater for people with differing needs.

OCTEC staff are expected to deliver the organisation's services and to perform their specific duties in a manner that is consistent with the values of the organisation. These are:

**Quality Service Provision** – We are committed to the pursuit of excellence and aim to provide a high-quality service to all the clients and communities we work with.

**Financial Sustainability and Flexibility** – We conduct our operations with a constant focus on financial viability, both short-term and long-term, to ensure that we can continue to deliver the many services we provide. We also remain flexible and open to business opportunities as they arise, so that we can grow the organisation and continue to deliver a wide range of services that are responsive to community needs.

**Community Based** – While operating in a professional, business-like manner, we maintain an awareness of our community origins, have a strong emphasis on localised service provision, and encourage staff involvement in local community groups, activities and events.



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**Ethical and Honest** – We expect our staff to always perform their duties in an ethical and honest manner.

**Caring** – We care for our staff as individuals with needs and responsibilities that go beyond the workplace, and in turn, we expect our staff to provide our services in a caring manner – individualised, empathic, compassionate and outcome-focused.

**Child Safe** - We are committed to the protection, safety and wellbeing of the children and young people who participate in our programs.

**Committed** – We expect staff to demonstrate a commitment to their work and to the organisation that goes beyond it being ‘just a job’. In turn, OCTEC is committed to supporting staff members to grow, develop, progress and experience high levels of job satisfaction.

**Professional** – We expect staff to perform their duties in a professional manner, built on the foundations of caring, committed, ethical and honest behaviour.

**Environmentally Sustainable** – We adopt and maintain practices that reduce the generation of waste, lower energy consumption and encourage the use of recycled materials.

### Supply Chains

OCTEC has 32,600 suppliers active in our accounts system, with all but four based in Australia. The four non-Australian-based suppliers are all in the United States, and are used for information technology purchases:

The goods and services that OCTEC purchases are in five main categories. These are:

**Office Operations** – office rental, IT hardware and software, telecommunications, stationary, cleaning and office supplies, insurance, work uniforms, accommodation, airfares, catering and hospitality, website hosting, graphic design, printing, promotional merchandise.

**Vehicle Fleet** – cars, fuel, servicing, registration, insurance.

**Client Support** – training courses, work clothing, personal protective equipment, tools, on-the-job mentoring and support, medical services, allied health services, counselling, fuel, motor vehicle servicing, registration, repairs, insurance, scooters, bicycles, public transport, relocation services, housing, groceries.

**Farm Operations and Supplies** – farm equipment and machinery purchase and rental, repairs, irrigation equipment, plants and seedlings, fertilizer, herbicides, tree removal.

**Jam and Other Product Production** – frozen fruit, sugar, lemon juice, oil, honey, bottles, labels, kitchen equipment.

OCTEC takes a risk-based approach to suppliers who are providing products and services directly related to the provision of government contracted services. This includes Information technology hardware and software, and services attached to or used to deliver services. The risk assessment is based on ISO27001 controls, with suppliers that are deemed medium risk requiring mitigation, and those deemed high risk being excluded as suppliers.



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### **Risks of Modern Slavery Practices in Operations and Supply Chains (Criterion 3)**

OCTEC has analysed our operations and supply chains to consider the risk that we are causing, contributing, or directly linked to modern slavery practices. We believe that the risk of modern slavery in our operations and amongst our direct suppliers is low, given that our service delivery is conducted entirely within Australia in compliance with all relevant laws, and that 99.99% of our suppliers are based in Australia with the four non-Australian-based suppliers all based in the United States.

However, we understand that OCTEC is not immune to the risks of modern slavery practices and that we may be exposed to modern slavery practices through second and third tier suppliers that operate in our supply chain. For this reason, we have undertaken an initial scoping exercise to help identify and describe the risks of modern slavery practices in these extended supply chain tiers.

This exercise considered geographic risks related to the countries from which our direct suppliers may source materials; the sectors and industries present in our extended supply chains over which we have low visibility and which could involve low paying, low skilled or hazardous work; and the products and services that we purchase which may involve workers from migrant, low socioeconomic or culturally and linguistically diverse backgrounds.

As a result of our assessments, we've identified the following areas of vulnerability:

- IT hardware manufacture and assembly, especially where outsourced to countries that don't have a strong rule of law or mechanisms that protect human rights;
- Uniforms, other clothing and textiles sourced from Asian countries where forced, bonded or child labour may be present.

### **Actions Taken to Assess and Address Risks (Criterion 4)**

OCTEC's actions to assess and address risks of modern slavery in our supply chains are guided by the principles set out in the United Nations Principles on Business and Human Rights.

Where the identification and assessment of potential risks of exposure to modern slavery identifies any that are higher than low risk, OCTEC will develop strategies to minimise these risks. Appropriate strategies may include:

- implementing due diligence processes for our large and high-risk suppliers including issuing supplier questionnaires regarding their modern slavery risk approach
- asking large and high-risk suppliers to sign a modern slavery declaration on commencement of their working relationship with OCTEC
- developing a supplier checklist to be completed by our Corporate Services staff before commencing procurement with a new supplier



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- developing a procurement policy for how we deal with suppliers and a supplier code of conduct that makes clear the standards we expect
- providing training for our staff on the subject of modern slavery and our policies to address the risks.

OCTEC commits to ongoing action to address any risks of exposure to modern slavery that we identify. This includes ensuring that our policies, procedures and controls remain valid and effective to mitigate any identified, new or increased risks we discover.

### **Assessing the Effectiveness of Actions Taken (Criterion 5)**

OCTEC will assess the effectiveness of our actions to address any risks of modern slavery in our supply chains, in line with the principles set out in the United Nations Principles on Business and Human Rights.

For each strategy implemented by OCTEC, we will develop KPIs to assess their effectiveness. These may include:

- the number and percentage of large and high-risk suppliers completing questionnaires regarding their modern slavery risk approach
- the number and percentage of large and high-risk suppliers signing modern slavery declarations on commencement of their working relationship with OCTEC
- the number of new suppliers for whom checklists are completed by our Corporate Services staff prior to procurement commencing
- progress on the development, implementation and use of any procurement policies and supplier codes of conduct
- completion rates for training for our procurement staff on the subject of modern slavery and our policies to address the risks

Based on our measurement against these KPIs, we will adapt and strengthen our strategies to further develop and continually improve our response to modern slavery.

### **Process of Consultation (Criterion 6)**

OCTEC Limited does not own or control any other entities and as such, no consultation is required and this criterion is not applicable to OCTEC.

### **Other Relevant Information (Criterion 7)**

This is OCTEC Limited's first Modern Slavery Statement having exceeded the \$100 million in consolidated revenue for the first time in 2023. We anticipate significant development of our response to modern slavery in subsequent reporting periods.



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## Board Approval

This is OCTEC Limited's Modern Slavery Statement for the period 1 January 2023 to 31 December 2023. It was deemed to be approved by the OCTEC Limited Board on 24 January 2025.

Cr Jeff Whitton FAICD  
OCTEC Chairperson